

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**ARTHUR EDWARD SUAREZ, JR.,
KENDRA DEANNE SINGLETARY,
DANA MICHAELLE STOKES,
TONEY EUGENE BAHE,
NATHAN ALLEN LEWELLING,
KENNETH WAYNE TONEY,
OSMAN ROLANDO SANCHEZ,
KAYLA MARISA BRADFORD,
JEREMY NATHANIEL STAGE,**

Defendants.

Case No. 24-CR-0372-SEH

Government's Notice of Intent to Offer Expert Witness Testimony

The United States submits this Notice of Intent to Offer Expert Witness Testimony under Fed R. Evid. 702, 703, and 705 and Fed. R. Crim. P. 16(a)(1)(G)(i). The United States intends to call the forensic scientists from the DEA South Central Laboratory and possibly OBN Laboratory who will test the drugs in this case.

The drugs are still being processed and no reports are available at this time. Thus, it is not known to the government which forensic scientist(s) it intends to call.

The government intends to call each of these witnesses as an expert in controlled substance analysis. Each witness will testify as to procedure and methodology for testing for controlled substances, handling of evidence and documentation of same.

The witnesses will each testify that his or her analysis involved the application of scientific disciplines including chemistry and forensic science. The witnesses will testify consistently with the controlled substance analysis reports that will be included as part of the government's discovery.

The government reserves the right to question the experts regarding other matters that may be raised during cross-examination by the defendants, based upon the testimony elicited from defendants' experts, if any, or other witnesses, or the evidence introduced by the defendants. To the extent the Court allows the defendants the same right, the government reserves the right to elicit any additional testimony that these experts are qualified to provide should the need arise based on further developments in preparing for and during the trial.

The government also reserves the right, within the limitations set by law and the Court, to amend this notice if the defense provides additional disclosure and to call additional expert witnesses if the need arises after the date of this filing.

At the time of this Notice, Defendants Kenneth Wayne Toney, Osman Rolando Sanchez, and Jeremy Nathaniel Stage remain at large with an active federal arrest warrants.

Respectfully submitted,

CLINTON J. JOHNSON
United States Attorney

/s/ Mandy M. Mackenzie

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Certificate of Service

I hereby certify that on the 30th day of December, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Kathrine Greubel
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Defense Counsel for Singletary

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/s/ Mandy M. Mackenzie
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Assistant United States Attorney